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MAY X 2 2012  
U. S. DISTRICT COURT  
E. DIST. OF MO.  
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**COUNT TWO**

The Grand Jury further charges that:

Beginning in or around July 2000, and continuing through April 2012, in the Eastern District of Missouri, and elsewhere,

**TIMOTHY O'LAUGHLIN,**

the Defendant herein, with the intent to harass and to place under surveillance with the intent to harass and intimidate, and to cause substantial emotional distress to a person in another State, namely E.C., did use interactive computer services and facilities of interstate commerce to engage in a course of conduct that caused substantial emotional distress to E.C. and placed E.C. in reasonable fear of the death of, and serious bodily injury to, herself and a member of her immediate family.

In violation of Title 18, United States Code, Section 2261A(2)(A).

**COUNT THREE**

The Grand Jury further charges that:

On or about December 6, 2011, in the Eastern District of Missouri, and elsewhere,

**TIMOTHY O'LAUGHLIN,**

the Defendant herein, did knowingly transmit in interstate commerce a communication containing a threat to injure the person of another, to-wit: an interstate telephone call from the State of Illinois to offices of The Boeing Company located in the Eastern District of Missouri.

In violation of Title 18, United States Code, Section 875(c).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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D. JOHN SAUER, #58721MO  
Assistant United States Attorney